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Counsel for Plaintiff

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

GINA CARANO,) Case No.: 2:24-cv-01009-SPG-SK
)
Plaintiff,) PLAINTIFF'S NOTICE OF MOTION
) AND MOTION TO COMPEL
v.) DISCOVERY
)
THE WALT DISNEY COMPANY,)
LUCASFILM LTD, LLC, and) Discovery Document: Referred to Magistrate
HUCKLEBERRY INDUSTRIES) Judge Steve Kim
(US), INC.,)
)
Defendants.)
)
)

) Date: April 23, 2025
) Time: 10:00 a.m.
) Location: 255 E. Temple Street,
) Los Angeles, CA 90012,
) Courtroom 540
) Judge: Mag. Steve Kim
)
) Discovery Cutoff:
) August 29, 2025 (fact discovery);
) September 15, 2025 (expert discovery)
) Final Pre-trial Conference: January 21, 2026
)
) Trial: February 17, 2026
)

PLEASE TAKE NOTICE THAT at 10:00 a.m. on April 23, 2025, or as soon thereafter as the Court is available, Plaintiff Gina Carano will—and through this notice, does—move for an order compelling Defendants The Walt Disney Company, Lucasfilm LTD, LLC, and Huckleberry Industries (US), Inc., to produce documents responsive to Requests for Production 31 and 62 to 66 within seven days. These requests are directly related to Plaintiff's claim for damages and seek documents Plaintiff's experts need to complete their analysis and reports within the expert disclosure deadline of July 18, 2025. For the reasons Plaintiff provided in the parties' Joint Stipulation, the motion should be granted.

CERTIFICATION OF LOCAL RULE 37-1 COMPLIANCE

The parties have met and conferred multiple times to discuss a variety of discovery issues before Plaintiff filed this motion to address the few issues upon which the parties have been unable to reach an agreement. The parties held meet-and-confer conferences via video conference on November 4, 2024 (lasting approximately 45 minutes), November 22, 2024 (lasting approximately 1 hour), on January 7, 2024 (lasting approximately 2 hours), on January 29, 2025 (lasting

1 approximately 1 hour), and on February 12, 2025 (lasting over 1 hour). Each of the
2 issues set out below were also addressed in nine letters from Plaintiff (dated October
3 14, November 11, November 18, December 5, and December 11, 2024, January 21,
4 February 3, February 10, and February 17, 2025) and four letters from Defendants
5 (dated January 15, January 24, February 5, and March 7, 2025). The February 3,
6 2025 letter requested a Local Rule 37-1 conference within 10 days. And the February
7 10, 2025 letter outlined the issues that would be the subject of that call, and
8 Plaintiff's points for each remaining disputed RFP.

9 As required by Judge Kim's Modified and Supplemental Requirements for
10 Prefiling Conference of Counsel under Local Rule 37-1, the parties held video
11 conferences on January 29 and February 12, 2025, as noted above, where the merits
12 of each disputed discovery issue and the necessary discovery procedures—including
13 Plaintiff's plan to move for an order compelling discovery by sending Defendants a
14 Joint Stipulation—were discussed. Based on those discussions, the parties reached a
15 resolution of several issues leaving only the few requests for production identified
16 above requiring the Court's attention at this time. The parties have reached an
17 impasse on the issues at issue in this Motion, and they cannot be eliminated or
18 narrowed by either further discussion of the merits or by ensuring further compliance
19 with Judge Kim's Modified and Supplemental Local Rule 37-1 Requirements.

20 **CERTIFICATION OF LOCAL RULE 37-2 COMPLIANCE**

21 A Joint Stipulation of Issues in Dispute is concurrently filed pursuant to L.R.
22 37-2. As required, the "initial case schedule, as well as any amendments" are
23 included.

24 **MEMORANDUM OF POINTS AND AUTHORITIES**

25 Any party "upon reasonable notice" may apply for an order compelling
26 discovery or disclosure. Fed. R. Civ. P. 37(a). The parties in this case have, as
27 required by Local Rule 37-2.1, included in their joint stipulation "all issues in dispute
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1 and, as to each such issue, the contentions and points and authorities of each party.”
2 For the reasons given in the Joint Stipulation, the motion should be granted.
3

4 DATED: April 2, 2025

SCHAERR | JAFFE LLP

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6 By: /s/ Gene C. Schaerr
7 Gene C. Schaerr
8 *Counsel for Plaintiff*
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CERTIFICATE OF COMPLIANCE

The undersigned, counsel of record for Plaintiff Gina Carano, certifies that this motion contains 533 words, which complies with the established word limit of Local Rule 11-6.1.

Dated: April 2, 2025

/s/ Gene C. Schaerr

Gene C. Schaerr

Counsel for Plaintiff